

US EPA RECORDS CENTER REGION 5



487134

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 254 179 529**

May 4, 1999

Mr. Duane Heaton  
Remedial Project Manager  
CERCLA Enforcement Section  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Subject: BASF Corporation Riverview Site Inspection Report and  
Proposed Site Modification Program  
Riverview, Michigan

Dear Mr. Heaton:

Please find enclosed the Spring 1999 inspection report for the BASF Corporation Riverview Site. Submittal of this report is required by Consent Decree No. 80-73699 of July 1984. Please notify BASF if there is another person at EPA who should receive this report and information.

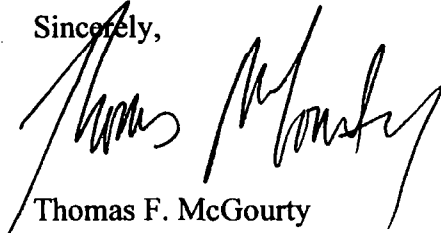
The Michigan Department of Environmental Quality (DEQ) contacted BASF and requested a Work Plan to conduct an environmental assessment of the Riverview property and to evaluate potential impact from groundwater to the Detroit River. BASF provided the Work Plan to the DEQ on April 20, 1999. In addition to the Work Plan, BASF was directed to mitigate or prevent contaminated surface water runoff from entering the Detroit River. Our plans to accomplish this goal are being developed, and portions of which run counter to certain of the requirements for site modification as specified in the Consent Decree. This letter informs the EPA of our plans and the reasoning behind them.

Under the terms of the Consent Decree, BASF was to maintain a concrete ditch through the center of the property that directs surface water runoff to the River. Currently, the level of the ditch is below the water table, and due to cracks and breaks in the ditch, groundwater is moving directly into the ditch and flowing to the River. BASF is preparing a construction plan to remove the concrete ditch, lay a geo-textile fabric on the ground, cover the fabric with clay, and re-grade the area. Completion of this work will prevent groundwater from seeping to the ground surface, mixing with runoff, and flowing into the River.

The Riverview property is essentially a 30-acre lawn. Although the Consent Decree only permits deep-rooted vegetation in uncapped areas, BASF believes the absence of trees, shrubs, and other similar vegetation contributes to the high water table present on the property. We therefore believe the use of fast-growing, water-scavenging trees will consume large volumes of groundwater and mitigate potential adverse effects on the River. BASF plans to plant a multitude of hybrid poplar trees (possibly several thousand) on uncapped portions of the property. The planting could occur as early as the next few weeks, and it will be concentrated around the western perimeter of the site. As the environmental assessment proceeds, additional planting may occur as we complete the assessment in particular areas. For example, BASF plans to install additional monitoring wells between the caps and the River. Once this work is complete, trees could be planted in that area as well.

Please feel free to call me at 734-324-6209, or Mr. Jack Lanigan at (734) 324-6219, with questions.

Sincerely,



Thomas F. McGourty  
Manager, Quality and Ecology Services

Enclosure

cc: Beth Vens, MDEQ  
Keith Mast, URSGWC  
John Gerlach, BASF  
Jack Lanigan

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FOLDER NUMBER: 1490M6.RTE

Inspection Date:

27 April 1999

Agency Report Date:

Spring 1999

AGENCY REPORT IS DUE WITHIN TWO WEEKS AFTER INSPECTION.

UPON REVIEW AND APPROVAL, RETURN THIS PM TO ECOLOGY FOR PREPARATION OF PRINTED REPORT AND FILING BY SITE ENGINEERING.

This PM requires the inspector to look at many things and walk or drive over a large area. The inspector should read this PM completely prior to making the inspection so that no wasted effort has to occur "Going Back".

## I. Inspect entire fence.

- A. Fence must be completely intact, including 3 strands of barbed wire on top. All gates must be locked.

- I.A. Make a list of any broken barbed wire, broken or deformed fence, bent or damaged fence posts or rails, gate hinges, locks, etc.

Observation:

Fence and wires are in good condition. All gates are locked.

Response:

- B. Inspect signs on fence. Signs must face outward from property. The signs must be spaced at 100' intervals on all four sides of the property. The signs must be in good condition with 1-1/2" high letters.

- I.B. 1. Are signs spaced every 100 ft.? Yes ☒ No ☐  
2. Make a list of missing, rusted, bent, illegible, etc., signs.

WARNING

KEEP OUT

MANAGED INDUSTRIAL WASTE DISPOSAL AREA

Observation:

All signs in place

Response:

## II. Inspect vegetation from Jefferson/to the water and from the common property line with Firestone to the municipal ramp.

- A. Look for any "bare" areas (spots or areas which do not have plant life growing).

- II.A. List "bare" areas. Describe size and location of bare spot.

Observation:

Bare spot on east side between Cap and River.

Response:

Will address when offer

Issues are resolved

B. Measure the height of the vegetation. As the vegetation is measured, look for areas where growth is stunted.

II.B. List the "average" height of the vegetation.

Observation:

Lawn is in good condition.

Response:

First mowing of season was 4/26/69. AVE ~~height~~ height 3 inches

III. Inspect the shoreline for stability.

III. List any shoreline erosion, washing, other deterioration or accumulation of debris.

Observation:

No erosion or deterioration.

Response:

Accumulated winter trash & debris at shore.

IV. Review the integrity of the compacted clay cover.

A. Inspect the entire area for the physical condition of the surface.

IV.A. List any erosion, standing pools of water, weathering, change in drainage patterns, etc.

Observation:

No evidence of erosion, weathering or change in drainage pattern. No standing water.

Response:

B. Look for any deep-rooted vegetation (trees or other plant life which might or does have tap roots). Any vegetation which is taller than surrounding vegetation should be considered deep-rooted.

IV.B. List deep-rooted vegetation.

Observation:

No deep-rooted vegetation.

Response:

V. Inspect the berm which is constructed along the common property line with Firestone. This berm is constructed to eliminate water flowing from the Firestone property onto the site.

V. Is the berm at least 6 inches above the level of the Firestone property at the property line?

Yes ☒ No ☐

Is there any evidence of water flowing from the Firestone property onto the site?

Yes ☐ No ☒

VI. Inspect the two concrete drainage ditches on the site, one through the center and one at the northeast corner.

VI.A. List any cracks in the concrete, leaking through the cracks, accumulated debris, standing water, etc.

A. Look at overall condition of the ditches.

Observation: Debris washed into North ditch from river. Otherwise in fine shape. Center ditch is dammed with sand bags to collect water for transport off site.

Response: \_\_\_\_\_

B. There are thirty (30) joints in the center ditch. Note condition of each joint. Is joint in place or is it protruding above the surface of the concrete? Is ☐ Joint 1: the joint leaking? If there is standing water at the joint, is it clear or off color?

VI.B. List condition of each joint.

Observation: Good condition  
clear water in ditch

Response: \_\_\_\_\_

☐ Joint 2: ☐ Joint 3:

Observation: Good condition  
clear water in ditch

Response: \_\_\_\_\_

Observation: Good condition  
☐ clear water in ditch

Response: \_\_\_\_\_

☐ Joint 4:

Observation: Concrete cracked & leaking. Joint ok. Clear water in ditch.

Response: Will address with other issues to be resolved

Joint 5:

Observation: Concrete cracked and leaking. Joint ok. Clear water in ditch.

Response: Will address with other issues

Joint 6:

Observation: Concrete cracked & leaking. Joint ok. Clear water in ditch.

Response: Will address with other issues

Joint 8:

Observation: Concrete badly cracked & leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 10:

Observation: Concrete & joint leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 7:

Observation: Concrete & joint badly cracked & leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 9:

Observation: Concrete cracked & leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 11:

Observation: Concrete cracked & leaking. Joint leaking. Water is reddish-brown.

Response: Will address with other issues

VI. B. (Cont'd.) There are thirty (30) joints in the center ditch. Note condition of each joint. Is joint in place or is it protruding above the surface of the concrete? Is the joint leaking? If there is standing water at the joint, is it clear or off color?

VI.B. List condition of each joint.

Joint 12:

Observation: Concrete cracked. Joint leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 13:

Observation: Concrete cracked. Joint leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 14:

Observation: Concrete cracked. Joint leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 15:

Observation: Concrete cracked. Joint leaking. Water is reddish-brown.

Response: Will address with other issues

Joint 16:

Observation: Joint ok. Water reddish-brown.

Response:

Joint 17:

Observation: Concrete cracked. Joint leaking. Water reddish-brown.

Joint 18:

Observation: Joint ok. Water reddish-brown.

Response: will address with  
other issues

Response: \_\_\_\_\_

Joint 19:

Observation: Joint needs conk.  
setting additl. imp. work

Response: will address with  
other issues -

Joint 20:

Observation: Concrete & Joint ok  
discolored water in ditch

Response: \_\_\_\_\_

Joint 21:

Observation: Joint & concrete ok  
Discolored water

Response: \_\_\_\_\_

Joint 22:

Observation: Joint & concrete ok  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 23:

Observation: Joint & concrete ok  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 24:

Observation: Joint & concrete ok  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 25:

Observation: Joint & concrete ok.  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 26:

Observation: Joint & concrete ok  
Discolored water in ditch

Response: \_\_\_\_\_

VI. B. (Cont'd.) There are thirty (30) joints in the center ditch. Note condition of each joint. Is joint in place or is it protruding above the surface of the concrete? Is the joint leaking? If there is standing water at the joint, is it clear or off color?

VI.B. List condition of each joint.

Joint 27:

Observation: Joint & concrete ok  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 28:

Observation: Joint & concrete ok.  
Discolored water in ditch

Response: \_\_\_\_\_

Joint 29:

Observation: Joint & concrete ok ☐  
Discolored water in ditch ☐

Response: \_\_\_\_\_ ☐

Joint 30:

Observation: Joint & concrete ok ☐  
clear water in ditch ☐

Response: \_\_\_\_\_ ☐

There are four (4) joints in the north ditch. Note condition of each joint. Is joint in place or is it protruding above the surface of the concrete? Is the joint leaking? If there is standing water at the joint, is it clear or off color?

Joint A:

Observation: Joint fine

Response: \_\_\_\_\_

Joint B:

Observation: Joint fine

Response: \_\_\_\_\_

Joint C:

Observation: Joint fine

Response: \_\_\_\_\_

Joint D:

Observation: Joint fine

Response: \_\_\_\_\_

VII. Inspect each of the nine (9) monitoring wells for integrity.

VII. List any problems with the wells.

Observation: All wells in

good condition & locked.

Response: \_\_\_\_\_

Upon completion of this PM, it must be routed for signature/comments as indicated on page 1.

Inspected by: Jack Guizer

Date Inspected: 27 April 1999

PM Reviewed and Response initiated by: John F. Berlock

Date: 4/30/99